

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	<b>No. 3:22-00395-2</b>
<b>v.</b>	)	<b>Judge Richardson</b>
	)	
<b>SEAN MCCOMBS</b>	)	

**MOTION TO JOIN**

Comes now the defendant, Sean McCombs, by and through his counsel of record, David R. Heroux, and herein moves this Honorable Court for leave to join the pleading filed by co-defendant Stout at Docket Entry 30, namely: “MOTION AND INCORPORATED MEMORANDUM TO CONTINUE TRIAL AND TO EXTEND THE DEADLINE FOR FILING PRETRIAL MOTIONS.” Defendant McCombs is similarly situated with the co-defendant Stout, and for the reasons stated in the co-defendant’s motion, the defendant joins in the motion and seeks the same relief. In support of this motion the defendant will file a signed Speedy Trial Waiver once it is received from the jail where the defendant is housed.

Respectfully submitted,

**Haymaker & Heroux, P.C.**

S:/ David R. Heroux  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing “MOTION TO JOIN” has been electronically sent via e-mail to the following through the Electronic Filing System:

Brooke C. Farzad  
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Thomas C. Williams  
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On this the 25<sup>th</sup> day of January, 2023.

s/ David R. Heroux  
David R. Heroux